

Cabinet

13 July 2023

Modern Slavery Statement

Recommendations

That Cabinet:

1. Approves the Council's updated Modern Slavery and Human Trafficking Statement for the financial year 2022/23; and
2. Authorises the Strategic Director for Resources to publish the Council's Modern Slavery and Human Trafficking Statement on the Central Government Registry alongside the estimated income for the Council in the year covered by the statement.

1. Executive Summary

- 1.1 The Modern Slavery Act 2015 is a piece of legislation designed to combat modern slavery and human trafficking. Section 54 of Act requires certain organisations to develop a Modern Slavery and Human Trafficking Statement (a Statement) each year. The Statement must set out what steps the organisation has taken during the previous financial year to ensure that modern slavery is not taking place in any part of its business or supply chain.
- 1.2 The organisations required to develop a Statement include commercial organisations which supply goods or services and have a total turnover of not less than £36m. Whilst it is has previously not been clear whether this requirement currently applies to local authorities, the Council has taken the view that it could and therefore has published a Statement since 2018. In any event, the government has now indicated that it intends to change the legislation so it is clear that it includes public bodies which have a budget of more than £36m and therefore whilst we are still awaiting these legislative changes, it would appear sensible to continue to publish a Statement.
- 1.3 The government also has a central registry for organisations to publish their Statements which was launched in March 2021 and whilst it is not currently mandatory to publish Statements on the registry it is strongly encouraged and the government plans to make this a requirement under the legislation for any organisation that is required to produce a Statement under section 54 of the Act. The Council published its Statement on the Registry for the previous two financial years.

- 1.4 The Central Government Registry also asks for the turnover or budget of the organisation in the year covered by the Statement. The Council's estimated turnover for the financial year covered by the statement (2022/23) is over £500 million.

2. Changes to the Statement since last year

- 2.1 The High-Risk section has been amended to include the following activities:
- 2.1.1 The Council's [Asylum Seekers](#) and [UK Resettlement](#) schemes alongside the Homes for Ukraine scheme;
 - 2.1.2 The activities of the Warwickshire Recovery Investment Fund (WRIF) due to the increased risk of money laundering and its link with modern slavery and human trafficking;
- 2.2 The Responsibility (Investigations/due diligence) section has been amended to include reference to further information and guidance that is available for Council staff on making modern slavery referrals via the national framework.
- 2.3 The Initiatives section has been amended to include details of the following initiatives:
- 2.3.1 Devolved Decision Making – this provides details of the Home Office pilot that the Council is currently participating in to devolve decision making for child victims of modern slavery;
 - 2.3.2 National Referral Mechanism Coordination – this provides details of the NRM Coordinator and explains what their role is;
 - 2.3.3 Child Exploitation Awareness – this provides details of the Something's Not Right website and action the Council has taken to raise awareness of child exploitation.
- 2.4 The Relevant Policies section has been updated to reflect that the Whistleblowing policy is currently being reviewed to ensure that it remains up to date.
- 2.5 The Training section has been updated to explain awareness raising of modern slavery for all social care employees including reference to more training that is being developed.
- 2.6 The Partnership section has been updated to refer to the Something's Not Right partnership.

3. Proposed amendments to the legislation

- 3.1 Amendments to the legislation were proposed in a Modern Slavery Bill published in June 2021 with the aim of increasing the accountability of companies and other organisations operating in the UK to drive modern

slavery and human trafficking out of their supply chains. It included the proposed introduction of two offences. The bill was discontinued after its first reading but amendments to strengthen the legislation are still anticipated.

4. Financial Implications

- 4.1 There are no specific financial implications arising from the report. The actions and activity outlined within the Statement can be delivered from within the Council's existing resources.

5. Environmental Implications

- 5.1 There are no specific environmental implications arising from the report.

6. Timescales associated with the decision and next steps

- 6.1 Once the Statement is approved it will be published on the Council's website and on the Central Government Registry within 6 months of the end of the Council's financial year.
- 6.2 The legislation states that the Statement: "if the organisation is a body corporate other than a limited liability partnership, must be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent)". As an executive function, Cabinet currently approves the Statement and it is signed by the Leader, however, officers are considering recommending that for future years the Leader delegates this function to the relevant Portfolio Holder to approve each year. The Constitution would need amending to reflect this.

Appendices

Appendix 1 - updated Modern Slavery and Human Trafficking Statement for the financial year 2022/23.

Background Papers

None

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The report was circulated to the following members prior to publication:

Local Member(s): N/A – this is a countywide matter

Other members: Chair and Vice Chair and members of Chair and Spokes